

EXHIBIT A

Case Number: 18-cv-2192 (BMC)(PK)18-cv-4670 (BMC)(PK)**OPEN DRAFT****PROPOSED DISCOVERY PLAN**

	DONE	NOT APPLICABLE	PROPOSED DATE
A. ACTIONS REQUIRED AFTER THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	<input checked="" type="checkbox"/>		
2. Rule 26(a)(1) disclosures exchanged			July 15, 2019
3. Requests made:			
a. Medical records authorization			
b. Proposed stipulation of confidentiality			July 15, 2019
4. Procedures for producing Electronically Stored Information (ESI) discussed			July 15, 2019
B. SETTLEMENT			
1. Plaintiffs have made a settlement demand		N/A	
2. Defendant to make settlement offer		N/A	
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		N/A	
4. Settlement Conference (proposed date)		N/A	
C. PROPOSED DEADLINES			
1. Motion to join new parties or amend pleadings		N/A	
2. Initial document requests and interrogatories			July 22, 2019
3. Responses to initial document requests and interrogatories			August 23, 2019
4. Deadline to file motion for protective order/motion to compel relating to foreign bank secrecy issues only (without prejudice to filing other discovery motions)			September 25, 2019
5. Deadline to file opposition brief to motion for protective order/motion to compel			October 25, 2019
6. Deadline to file reply brief to motion for protective order/motion to compel			November 11, 2019

7. Deadline to submit Requests for Judicial Assistance if foreign bank secrecy objections are overruled			5 business days following Court Ruling
8. Deadline for Defendant to notify the Court as to whether it will produce records ordered by the Court (if any)			90 days from the Issuance of any Letters Rogatory or other Requests for Judicial Assistance
I. IF DEFENDANT PRODUCES ALL RESPONSIVE RECORDS			
Completion of Fact Discovery			December 31, 2021
Case-in-chief expert reports due			90 days after close of fact discovery
Rebuttal expert reports due			60 days after the parties' case-in-chief expert reports are served
Completion of Expert Discovery			45 days after rebuttal expert reports are served
II. IF DEFENDANT REFUSES TO PRODUCE ALL RESPONSIVE RECORDS DUE TO FOREIGN BANK SECRECY:			
Plaintiffs to file Rule 37 motion seeking remedy			21 days from any refusal to comply with document production orders
Defendant to file opposition brief			21 days from Plaintiffs' filing of Rule 37 motion
Plaintiffs to file reply brief ¹			10 days from Defendant's opposition brief
Rule 72(a) objections to be filed			14 days from Court order on objections to Rule 37 remedies for foreign bank secrecy non-

¹ Assuming the Court grants Plaintiffs the right to file a reply brief.

			production
Filing of opposition(s) to Rule 72(a) objections			14 days from filing objections to Rule 37 remedies for secrecy non-production
File reply/replies to Rule 72(a) objections ²			7 days from opposition briefs to objections to Rule 37 remedies for secrecy non-production
A. Hamas-Only Trial Proceeds First			120 days after the District Court's Rule 37 Decision
B. All Attacks Tried Together			
Completion of Fact Discovery			45 days after the District Court's Rule 37 Decision
Case-in-chief expert reports due			90 days after the District Court's Rule 37 Decision
Rebuttal expert reports due			60 days after the parties' case-in-chief expert reports are served
Completion of Expert Discovery			45 days after rebuttal expert reports are served

This Scheduling Order may be altered or amended based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

PEGGY KUO
United States Magistrate Judge

Date

² Assuming the Court grants Plaintiffs the right to file a reply brief.